

March 5, 2025

**VIA ECF**

The Honorable Victor Marrero  
United States District Judge  
500 Pearl Street, Courtroom 15B  
New York, NY 10007

Re: *United States v. Global Business Travel Group, Inc., et al.*, No. 1:25-cv-00215-VM

Dear Judge Marrero:

The United States seeks the Court's leave to file under seal Exhibit 1 to its concurrently filed letter motion for further unsealing of Exhibit A to the Declaration of Michael F. Murray, ECF No. 56-1, which CWT Holdings, LLC ("CWT") has docketed publicly with redactions. The United States' Exhibit 1 to its letter motion for further unsealing contains highlighted proposed redactions that the United States offers for the Court's consideration as an alternative version of CWT's publicly docketed Exhibit A to the Murray Declaration. In accord with Section II.H of the Court's Individual Rules, Section 6 of the Electronic Case Filing Rules & Instructions of the United States District Court for the Southern District of New York, and Paragraphs 48 through 50 of the Stipulated Protective Order, ECF No. 38, the United States is publicly filing on ECF a slipsheet replacement for Exhibit 1 since a redacted version of Exhibit 1 would merely replicate the version filed publicly by CWT on February 20, ECF No. 56-1.

The United States requests to provisionally seal Exhibit 1 because it contains information that CWT has asserted and continues to assert is "strictly confidential." *See, e.g.*, Feb. 20 Ltr. from CWT at 1–2, ECF No. 56. Exhibit 1 is offered strictly for the Court's consideration and contains both information (highlighted in pink) that the United States contends should not be redacted—for the reasons explained in the concurrently filed letter motion—as well as information (highlighted in yellow) that the United States does not oppose redaction of during the current pre-trial posture.

Pursuant to the Court's Individual Practices, the United States identifies counsel for the United States, counsel for Global Business Travel, Inc., and counsel for CWT as those who should have access to the sealed version of Exhibit 1.

Respectfully submitted,

/s/ Michael Rosengart  
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